

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA
WHEELING DIVISION

THOMAS G. FIGANIAK and
VALERIE A. FIGANIAK, as
Administrators of the Estate of
Kevin Figaniak,

Plaintiffs,

v.

Civil Action No.: 5:15-CV-00111
Hon. Frederick P. Stamp, Jr., Senior Judge

FRATERNAL ORDER OF OWL'S HOME NEST,
LOYAL ORDER OF OWLS NEST LODGE 2558
d/b/a THE OWLS NEST, a West Virginia corporation,
YE OLDE ALPHA, INC., a West Virginia corporation,
CRAIG TYLER PEACOCK, individually,
JARRETT CHANDLER, individually, and
TYLER JOHNSON, individually,

JURY TRIAL DEMANDED

Defendants.

**DEFENDANT CHANDLER'S ANSWER TO LOYAL ORDER OF OWLS NEST LODGE
2558 d/b/a THE OWLS NEST'S CROSS CLAIMS**

Defendant Jarrett Chandler, by counsel, G. Thomas Smith, Esquire, M. Winiesdorffer-Schirripa, Esquire, and the law offices of Smith, McMunn and Glover, comes now to respond to the cross-claims of defendant Loyal Order of Owls Nest Lodge 2558 d/b/a The Owls Nest as follows:

First Defense

This answering defendant incorporates by reference hereto his Answer to the plaintiffs' Complaint filed on November 17, 2015, including all responses and affirmative defenses therein, as if the same were specifically set forth herein verbatim.

Second Defense

This answering defendant denies each and every allegation contained in the cross-claims of defendant Loyal Order of Owls Nest Lodge 2558 d/b/a The Owls Nest which has been alleged against him, including but not limited to any claims for contribution and indemnification.

WHEREFORE, defendant Jarrett Chandler respectfully requests that the cross-claims of defendant Loyal Order of Owls Nest Lodge 2558 d/b/a The Owls Nest as alleged against him be dismissed and he be awarded any other relief the Court deems appropriate.

Respectfully submitted:

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CERTIFICATE OF SERVICE

I hereby certify that on **November 30, 2015**, I electronically filed **Defendant Chandler's Answer to Defendant Loyal Order of Owls Nest Lodge 2558 d/b/a The Owls Nest Cross Claims** with the Clerk of the Court using the CM/ECMF system, which will send notification of such filing to the following that have entered an appearance in this matter.

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Respectfully submitted,

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